

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 17, 2015

Accepted / Filed

Via Hand Delivery

JUN 17 2015

Marlene H. Dortch, Secretary Federal Communications Commission
DOCKET FILE COPY OF Federal Communications Commission Officerof the Secretary 445 12th Street, SW Washington, DC 20554

Re:

WC Docket No. 14-58

2015 ETC Annual Report of Shidler Telephone Company

Study Area Code 432023

Dear Ms. Dortch:

On behalf of Shidler Telephone Company ("Shidler"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. 1 Shidler seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.2 The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd

List ABCDE

3 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200 9430 Research Blvd., Austin, TX 78759 phone: 512-338-0473, fax: 512-346-0822 Eagandale Corporate Center, Suite 310 1380 Corporate Center Curve, Eagan, MN 55121 phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road Bldg. B-3, Suite 200, Atlanta, GA 30328 phone: 770-569-2105, fax: 770-410-1608 547 South Oakview Lane Bountiful, UT 84010

phone: 801-294-4576, fax: 801-294-5124

^{1 47} C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).



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JUN 17 2015

Federal Communications Commission Office of the Secretary

Re: WC Docket No. 14-58

2015 ETC Annual Report of Shidler Telephone Company

Study Area Code 432023 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Shidler Telephone Company ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules, withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).

- 1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications
 Carriers ("ETCs") must file with the Commission a Progress Report on its FiveYear Service Quality Improvement Plan ("Progress Report") which is contained
 in the attachment to the 2015 Report.⁴
- 3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

^{1 47} C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

^{3 47} C.F.R. §§ 54.313, 54.422.

^{4 47} C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories." The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

- 5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

- 7. Any previous versions of this information are not publicly available.
- 8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

Klandell

162 A. C.	m 481 Carrier Addust Reporting (* REDAC Data Collection Forms	TED FOR PUBLIC!	NORECTION GREAT AND	And Control State Control State (1975)
<010>	Study Area Code	432023		A
<015>	Study Area Name	SHIDLER TEL CO		Accepted / Filed
<020>	Program Year	2016		
<030>	Contact Name: Person USAC should contact with questions about this data	Lisa Patton	0	JUN 17 2015
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9187932211 ext.		Federal Communications Commission Office of the Secretary
<039>	Contact Email Address: Email of the person identified in data line <030>	lisa@stinternet.net		
	LAINGRING FOR ALECARRERS			(check box when complete)
<100>	Service Quality Improvement Reporting		(complete attached worksheet)	1 1/1/1/1/1
<200>	Outage Reporting (voice)		(complete attached worksheet)	
<210> <300>	Unfulfilled Service Requests (voice) o	outages to report		
<310>	Detail on Attempts (voice)			
			(attach descrip	tive document)
<320>	Unfulfilled Service Requests (broadband)			1
<330>	Detail on Attempts (broadband)		(attach descri	(ptive document)
<400>	Number of Complaints per 1,000 customers (voice)	w		
<410>	Fixed 0.0			
<420>	Mobile 0.0 Number of Complaints per 1,000 customers (broad)	hand)		
<440>	Fixed 0.0	balldy		
<450> <500>	Mobile 0.0 Service Quality Standards & Consumer Protection R	ules Compliance	(check to indicate certification)	
1500	432023ok510.pdf		1	
<510>			(attached descriptive document)	/ /
	93			
<600>	Functionality in Emergency Situations 432023ok610.pdf		(check to indicate certification)	1 1
	•		(attached descriptive document)	
<610>				
<700>	Company Price Offerings (voice)		(complete attached worksheet)	
<710>	Company Price Offerings (broadband)		(complete attached worksheet)	141115
<800>	Operating Companies and Affiliates		(complete attached worksheet)	
	Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Certification	Y	ves, complete attached worksheet)	
<1010			(attach descriptive document)	
<1100	Certify whether terrestrial backhaul options exist (res or No) O	(if not, check to indicate certification)	
<1110>			(complete attached worksheet)	WILLIA.
<1200>	Terms and Condition for Lifeline Customers		(complete attached worksheet)	
	Price Cap Carriers, Proceed to Price Cap Additional			
<2000>	Including Rate-of-Return Carriers affiliated with Pr	ne cup Locui Exchange	(check to indicate certification)	111111
<2005>			(complete attached worksheet)	1111111
<3000>	Rate of Return Carriers, Proceed to ROR Additional	Documentation Work	sheet (check to indicate certification)	→ <i>************************************</i>
<3005>			(complete attached worksheet)	1111111

100) Se	rvice Quality Improvement Reporting			FCC Form 481	
Data Co	llection Form			OMB Control No. 3060-0986/OMB Control No. July 2013	3060-0819
<010>	Study Area Code	432023			
<015>	Study Area Name	SHIDLER TEL CO			
<020>	Program Year	2016			
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton			
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.			
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.n	net	3 80 92	
<110>	Has your company received its ETC certification from the FCC?	(yes / no	00		
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(ves / no	00		
<112>	Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only required to address voice telephony service.		023ok112.pdf		
	Please select the appropriate responses below (Yes, No, Not Applicable) to confit that the attached document(s), on line 112, contains a progress report on its five service quality improvement plan pursuant to \$54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	-year		Name of Attached Document	
:113>	Maps detailing progress towards meeting plan targets		Yes		
114>	Report how much universal service (USF) support was received		Yes	3	
115>	How much (USF) was used to improve service quality and how support was used to impro	we service quality	Yes		
116>	How much (USF) was used to improve service coverage and how support was used to imp	rove service coverage	Yes	7	
117>	How much (USF) was used to improve service capacity and how support was used to impr	ove service capacity	Yes	7	
	Provide an explanation of network improvement targets not met	and the first term of the		-	

(200) Service Outage Reporting (Voice) Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
COLO. Study Area Code	43000	

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
NOR Refere Numbe	oce Outage Start	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
										-	
						,					

	se Offerings including Voice flate Data ection Form	FT.C. Form AST. Obda Control No. 2010 0555/OMB Control No. 3050-0819 Ruly 2013
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<701>	Residential Local Service Charge Effective Date 1/1/2015	
<702>	Single State-wide Residential Local Service Charge	

	F (W.P.C.)	****		Residential Local	Charles Calendar Handles Charles	Shaha Habaaaad Samdaa Saa	Mandatory Extended Area	Total and line Bates and Fa
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fe
		\vdash						1
		-						

			Table of March Complete Company					**************************************
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1200 C 100 C 100 C	padband Price Offerings lection Form	PCSENHIEFT State Contrasted State Of SEcretaria No. 3000-0819 SM 3043
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select
Juic	Entirelling (IEEE)	Newscotton race	100	Total hate and rees	(mops)	Opiowa Speed (Imps)	(05)	talling Newtoness (percent
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		-	See attac	hed				
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27	erating Companies ection Form		FCL Perm 981 CBND Control No. 301000986 /OMB Control No. 3060-081 687-2013
<010>	Study Area Code		432023
:015>	Study Area Name		SHIDLER TEL CO
:020>	Program Year		2016
:030>	Contact Name - Person USAC should contact regarding this data		Lisa Patton
:035>	Contact Telephone Number - Number of person identified in data line <030>		9187932211 ext.
039>	Contact Email Address -	Email Address of person identified in data line <030>	lisa@stinternet.net
810>	Reporting Carrier	Shidler Telephone Company	
811>	Holding Company	Not Applicable	
812>	Operating Company	Shidler Telephone Company	

<813>	MARKET SHAPE	
Affiliates	SAC	Doing Business As Company or Brand Designation
Sales and the second se	-	
Sec. 4		
See at	ached worksho	eet –
		The second of th
200000000000000000000000000000000000000		
	-	

Comment of the state of the sta	bal Lands Reporting lection Form	PEC Fermi 481 OME Control No. 3060-0986/OME Control No. 3060-0819 July 2019
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<910>	Tribal Land(s) on which ETC Serves	ation
<920>	Tribal Government Engagement Obligation	Name of Attached Document

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

	Select
	Yes or No or
	Not Applicable
	Yes
N. Carlo	11/11/11/11/11
-	Yes
	Yes

13000015.53	o Terrestrial Backhaul Reporting lection Form	PCC Form 483 OMB Control No. 3060-9986/OMB Control No. 3060-0819 ANY 2013
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<1120>	Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 k upstream within the supported area pursuant to § 54.313(g).	bps

Lifeline	rms and Condition for Effeline Dustoniers ection Form		CETTO IN THE STATE OF THE STATE
<010>	Study Area Code		432023
<015>	Study Area Name		SHIDLER TEL CO
<020>	Program Year		2016
<030>	Contact Name - Person USAC should contact regarding this data		Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data	line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data	line <030>	lisa@stinternet.net
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	3	432023ok1210.pdf
			Name of Attached Document
<1220>	Link to Public Website	нттр —	
or the we	neck these boxes below to confirm that the attached document(s), on line basite listed, on line 1220, contains the required information pursuant to a)(2) annual reporting for ETCs receiving low-income support, carriers muleport:		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	1	
<1222>	Details on the number of minutes provided as part of the plan,		
<1223>	Additional charges for toll calls, and rates for each such plan.	1	

(2000) Pr	fee Cap Carrier Additional Documentation	
1947 V	ection Form	DVIS CENTRAL No. 9060 Sees/OMS Control No. 3060/0819
0.0000 (200.000)	Rate-of-Return Corriers affiliated with Price Cap Local Exchange Corriers	
Increasing)		
<010>	Study Area Code	
<015>	Study Area Name	432023
<020>	Program Year	SHIDGER TEL CO
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	Lisa Facton
<039>	Contact Email Address - Email Address of person identified in data line <030>	9167932211 6XL.
		lisawstinternet.net
BUTTON		
	그리고 있다면 하는데 아이들은 그리고 있다면 아이들에 살아가고 있다면 하는데 아들은 사람들이 되었다면 하는데 하는데 하는데 하는데 살아서 살아서 살아나면 하는데	s a recipient of incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, an
Connect	America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The Inform	mation reported on this form and in the documents attached below is accurate.
	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1)i)	and the deleter of th
<2011a	> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)	and the state of t
<2011b	Attachment (47 CFR § 54.313(b)(1)ii)	
~20120	Actachment (47 CFN & 54.515(D)(17))	
		Name of Attached Document(s) Listing Required Information
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	A.
<2012>	는 게임하는 것이 있는 경영에 가이를 하는데는 이번에서 이번에게 하면 함께 하는데 바람이 바람이 바다 하는데 아니다. 그리고 아니다 아니다 아니다 아니다 아니다 아니다 아니다.	,
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<2014>		
<2015>	면 보고 있는데 있다면 하면 하면 되었다. 이번 사람들은 이번 사람들이 되었다. 그는 그는 그는 그는 그는 그는	// · · · · · · · · · · · · · · · · · ·
-2020	(A) A (6 (A)A-544)	
	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))	
<2016>	Certification Support Used to Build Broadband	
	Connect America Phase II Reporting (47 CFR § 54.313(e))	and the state of t
<2017>	ord year broadband betvice certification	
<2018	Still year broadbaria service certification	·
<2019	mermi rogress certification	
<2020>		ne 2021, contains the required information
	pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support s	
	addresses of community anchor institutions to which began providing preceding calendar year.	g access to broadband service in the
	preceding calcidar year.	
<2021>	Interim Progress Community Anchor Institutions	
		1
		Name of Attached Document(s) Listing Required Information

	-010b Study Area Code -0215 Study Area Hame -0215 Study Area Hame -020 Program Year Farson USAC should contact regarding this data 201.6 -030 Contact Name - Ferson USAC should contact regarding this data 1,18.2 -035 Contact Telephone Number of Person Mentified in data line -030 2,18.73.22.1 -035 Contact Telephone Number of Person Mentified in data line -030 1,sasst internal.	on its five year service quality plan (parsuant to CFR § 54.313([/Z]. I further certify that the I	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f/(1)(1)) Name of Attached Document Listing Required Information	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f/(1)), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. 43.2023.0x3012.pdf	Community Anchor Institutions (47 CFR § 54.313(f)(1)(II)	ts your company a Privately Held ROR Carrier (47 CR § 54.313(f)(2)) If yes, does your company file the RUS annual report (Yes/No)	Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: [3015] Electronic copy of their annual RUS report. (Operating Report for Telecommunications Borrowers) [77] [77] [77]		Name of Attached Document Listing Required Information (fres/No) (1904) is your company audited?	if the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § \$4.313(fyl2), contains (Ether a copy of their audited financial ratement or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	Document(s) for Balance Sheat, Income Statement and Statement of Cash Flows	The response is no on line 3018, please check the boars below The response is no on line 3018, please check the boars below Contains: Contains:	Copy of their financial statement which has been subject to review by an independent certified public accountant, or 2) a financial report in a format comparable to RIS Operating Report for Telecommunications	Borrowers, Undertying information subjected to a review by an independent certified public accountant Undertying information subjected to an officer certification.	Document(s) for Balance Sheet, Income Statement and Statement of Cash Piores Attach the worksheet listing required information	Name of Matched Document Listing Required Information.
10 to	40105 Study A 40155 Study A 40205 Program 40305 Contact 40355 Contact 40355 Contact	CHECK the boxes	(3010) Progre Mileste	(3011) § 54.31 providin	(3012) Commu	(3014) is your	Please check th (3015) Electrol Telecon (3016) Docum	(3017) If the re report.	(3018) If the re	if the n confirm (3019) Either a	(3020) Docum		(3022) Capy of indeper format		(3026) Attach I	

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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

ertify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support cipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.		
Name of Reporting Carrier:		
Signature of Authorized Officer:	Date	
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

	ion - Againt / Carrier ection Porm	60C Forth 461 Olivie Control No. 2000/0596/Olivie Control No. \$000-0819 July 2019
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent) <u>Dee Dee Longenecker</u> also certify that I am an officer of the reporting carrier; my responsibilitiagent; and, to the best of my knowledge, the reports and data provided to	is authorized to submit the information reported on behalf of the reporting carrier, es include ensuring the accuracy of the annual data reporting requirements provided to the authorized to the authorized agent is accurate.
Name of Authorized Agent: Dee Dee Longenecker	
Name of Reporting Carrier: SHIDLER TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/16/2015
Printed name of Authorized Officer: Lisa Patton	
Title or position of Authorized Officer: Vice President	
Telephone number of Authorized Officer: 9187932211 ext.	
Study Area Code of Reporting Carrier: 432023	Filing Due Date for this form: 07/01/2015

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier				
i, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service sup the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the info	를 받는데 있다면 보면 있다면 보면 되었다. (1) 전 10 전	기계 가게 되었다.		
Name of Reporting Carrier: SHIDLER TEL CO				
Name of Authorized Agent or Employee of Agent: Dee Dee Longenecker				
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	06/16/2015		
Printed name of Authorized Agent or Employee of Agent: Dee Dee Longenecker	16			
Title or position of Authorized Agent or Employee of Agent Manager - Regulatory Affairs				
Telephone number of Authorized Agent or Employee of Agent: 5126953954 ext. 235				
Study Area Code of Reporting Carrier: 432023 Filing Due Date for this form: 07	/01/2015			

Attachments

ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY

Study Area	Code
Study Area	Name
Company C	ontact Name
Contact Tel	ephone Number
Contact Em	ail Address

432023		
Shidler Telephone Company		
Lisa Patton		
918-793-2211	31 - 110 m - 110 M - 110 M - 110 M	
lica@stinternet net		

Unfulfilled Broadband Requests - Calendar Year 2014

		DESCRIPTION OF SERVICE REQUESTED (include	
REF	CUSTOMER NAME	requested speed for broadband requests)	DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
1	Customer 1	Wynona customer wanted 6/1 but location was too remote.	Company purchased some Actelis equipment to try to boost existing DSL, but could not achieve requested speed. Customer currently has 3/1 Mbps service and Company continues to work on solution to increase download speed.
1	Customer 1	Telliote.	continues to work on solution to increase download speed.
2			
3			
4			
5			
6			
7		I TO TO THE STATE OF THE STATE	
8			
9			
47 CFR	§54.313 (a)(3)		

Shidler Telephone Company

Study Area Code 432023

Response to Line 510 - Service Quality Standards and Consumer Protection Rules Compliance - Voice and Broadband Service

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." The FCC found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis. In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

Shidler Telephone Company ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1); 2) the Truth-in-Billing Rules 47 CFR § 64.2401, as required in the OCC

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² Id. at para. 28.

³ Id. The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." Id. at n. 71.

⁴ Id. at n. 72.

rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

Shidler Telephone Company

Study Area Code 432023

Response to Line 610 - Ability to Function in Emergency Situations for Voice and Broadband

Shidler Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2). The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

- 1. 165:55-13-20. Responsibility for adequate and safe service
- 2. 165:55-13-22. Emergencies
- 3. 165:55-13-23. Adequacy of service
- 4. 165:55-13-24. Adequacy of equipment
- 165:55-13-50. Service standards; sufficient operating and maintenance force
- 6. 165:55-13-53. Restoration of service plan

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.